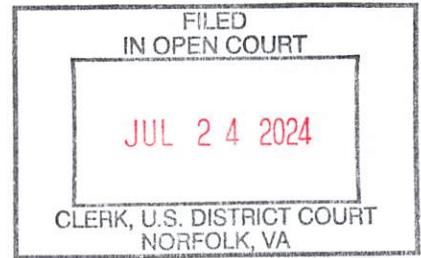


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
v.)	CRIMINAL NO. 2:24cr <u>71</u>
DEVON DRUMGOOLE, (Counts 1-5))	Conspiracy to Commit Mail and Bank Fraud 18 U.S.C. § 1349 (Count 1)
DARNELLE CONCEPCION, (Counts 1-6))	Bank Fraud 18 U.S.C. § 1344 and 2 (Counts 2-5)
and)	
QUASHEDA JONES, (Counts 1, 7))	Theft of Mail Matter 18 U.S.C. § 1709 (Counts 6-7)
Defendants.)	18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(A) & 28 U.S.C. § 2461 Criminal Forfeiture

INDICTMENT

JULY 2024 TERM – at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment, unless otherwise stated:

GENERAL ALLEGATIONS

1. Defendants DEVON DRUMGOOLE (DRUMGOOLE) and DARNELLE CONCEPCION (CONCEPCION) were residents of the Eastern District of Virginia and defendant QUASHEDA JONES (JONES) was a resident of the Middle District of North Carolina.
2. CONCEPCION was a city carrier for the United States Postal Service (“USPS”) at the Deep Creek Post Office located in Chesapeake, Virginia.

3. JONES was a carrier for the USPS and was employed by the USPS in Winston-Salem, North Carolina

4. Bank of America (“BofA”), TD Bank, N.A. (“TD Bank”), Chartway Federal Credit Union (“Chartway”), JPMorgan Chase Bank (“Chase”), and Navy Federal Credit Union (“Navy Federal”) were financial institutions as defined in 18 U.S.C. § 20 (hereinafter, the “financial institutions”) and had physical branches, Automatic Teller machines (“ATMs”), teller windows, and employees in the Eastern District of Virginia and elsewhere.

5. An “account mule” was an individual whose name was used to deposit illegally acquired checks and proceeds.

COUNT ONE
(Conspiracy)

6. The General Allegations of this Indictment are realleged and incorporated as if fully set forth herein.

7. From a time unknown to the Grand Jury, but beginning in and around November 2022, and continuing through in and around at least November 2023, in the Eastern District of Virginia, and elsewhere, the defendants DEVON DRUMGOOLE, DARNELLE CONCEPCION, and QUASHEDA JONES, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to commit mail fraud, that is, to devise and intend to devise a scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, promises, and material omissions (the "scheme to defraud"), and, for the purpose of executing and attempting to execute the scheme to defraud, to take and receive any matter and thing whatever to be sent or delivered by the USPS, in violation of 18 U.S.C. § 1341; and to commit bank fraud, that is, to execute and attempt to execute a scheme and artifice to defraud the

victim financial intuitions, and to obtain and attempt to obtain monies, funds, credits, assets, and securities owned by and under the custody and control of the victim financial institutions by means of materially false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344.

OBJECT OF THE CONSPIRACY

8. The object of the conspiracy was for the defendants to profit personally by obtaining hundreds of thousands of dollars through stolen checks.

MANNER, AND MEANS OF THE CONSPIRACY AND SCHEME TO DEFRAUD

It was part of the conspiracy and scheme to defraud that:

9. DRUMGOOLE, CONCEPCION, JONES and others known and unknown to the Grand Jury removed, and caused the theft of, dozens of business checks belonging to various companies that had been mailed via the USPS through various means, with a face value well in excess of one million dollars.

10. CONCEPCION and JONES used their positions as mail carriers to steal, take, remove, and cause the theft of, business checks belonging to victims that had been mailed via the USPS.

11. DRUMGOOLE made, and caused to be made, arrangements for himself and others known and unknown to the Grand Jury to obtain, procure, and collect checks from CONCEPCION and JONES.

12. DRUMGOOLE used peer-to-peer financial transfers to pay CONCEPCION and JONES for the stolen checks.

13. DRUMGOOLE collected, and caused the collection of, banking information and the means of identification belonging to account mules.

14. DRUMGOOLE altered, and caused to be altered, business checks to reflect payment to account mules.

15. DRUMGOOLE deposited and caused the deposit of altered and fraudulent checks into bank accounts belonging to account mules at various financial institutions.

16. DRUMGOOLE obtained, and caused to be obtained, the proceeds from altered and fraudulent checks by engaging in various monetary transactions to withdraw the proceeds, by way of, among other things, cash withdrawals.

(In violation of Title 18, United States Code, Section 1349.)

COUNTS TWO THROUGH FIVE
(Bank Fraud)

17. Paragraphs 1 through 16 of this Indictment are realleged and incorporated as if fully set forth herein.

18. On or about the dates listed below, in the Eastern District of Virginia and elsewhere, DEVON DRUMGOOLE and DARNELLE CONCEPCION, defendants herein, knowingly and willfully executed and attempted to execute the above-described scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, to wit:

Count	Date (on or about)	Defendant(s)	Description
2	March 29, 2023	DRUMGOOLE and CONCEPCION	Deposited an altered version of a check bearing number 10447, in the amount of \$11,656.75, at a Chase ATM in Norfolk, Virginia
3	March 30, 2023	DRUMGOOLE and CONCEPCION	Deposited an altered version of a check bearing number 11244, in the amount of \$23,644.00, at a Chase ATM in Norfolk, Virginia
4	May 25, 2023	DRUMGOOLE and CONCEPCION	Deposited an altered version of a check bearing number 2361, in the amount of \$13,946.00, at a Chase ATM in Dale City, Virginia
5	May 25, 2023	DRUMGOOLE and CONCEPCION	Deposited an altered version of a check bearing number 1786, in the amount of \$13,000.00, at a Chartway ATM in Virginia Beach, Virginia

(In violation of Title 18, United States Code, Sections 1344 and 2).

COUNT SIX

19. Paragraphs 1 through 16 of this Indictment are realleged and incorporated as if fully set forth herein.

20. On or about June 5, 2023, in the Eastern District of Virginia, the defendant, DARNELLE CONCEPCION, a United States Postal Service employee, did steal, abstract, and remove a letter, package, and mail containing a check bearing number 17447 made out in the amount of \$78,900.00 which had been entrusted to the defendant, and which had come into the defendant's possession intended to be conveyed by mail and carried and delivered by a carrier, messenger, agent, and other person employed in any department of the Postal Service, and which was forwarded through and delivered from a post office and postal station established by the authority of the Postmaster General and of the Postal Service.

(In violation of Title 18, United States Code, Section 1709.)

COUNT SEVEN

21. Paragraphs 1 through 16 of this Indictment are incorporated by reference as though fully set forth herein.

22. On or about October 26, 2023 in the Middle District of North Carolina, Eastern *ACM*
QVASHEDA
District of Virginia, and elsewhere, the defendant, *QUASHEDA* JONES, a United States Postal Service employee, did steal, abstract, and remove a letter, package, and mail containing a check bearing number 377283 made out in the amount of \$171,386.71 which had been entrusted to the defendant, and which had come into the defendant's possession intended to be conveyed by mail and carried and delivered by a carrier, messenger, agent, and other person employed in any department of the Postal Service, and which was forwarded through and delivered from a post office and postal station established by the authority of the Postmaster General and of the Postal Service.

(In violation of Title 18, United States Code, Section 1709.)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, DEVON DRUMGOOLE, DARNELLE CONCEPCION, and QUASHEDA JONES, if convicted of the violation alleged in Count One of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

2. The defendants, DEVON DRUMGOOLE, DARNELLE CONCEPCION, and QUASHEDA JONES, if convicted of any of the violations alleged in Counts Two through Five of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the violation.

3. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A); and Title 28, United States Code, Section 2461(c).)

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

United States v. Devon Drumgoole, et. al., Criminal No. 2:24cr 77

A TRUE BILL:

REDACTED COPY

FOREPERSON

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